

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

MIMO RESEARCH, LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS AMERICA,
INC. AND SAMSUNG ELECTRONICS
CO., LTD.,

Defendants.

Civil Action No. 5:22-cv-73-JRG-JBB

LEAD CONSOLIDATED CASE

JOINT MOTION TO STAY
ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiff MIMO Research, LLC and Defendants Samsung Electronics Company, Ltd. and Samsung Electronics America, Inc. have settled, in principle, all matters in controversy in the above-captioned action between the parties. Accordingly, the parties jointly move the Court to stay any and all unreached deadlines in this action for thirty (30) days in order to finalize the settlement of this matter and file appropriate dismissal papers.

Dated: December 20, 2022

Respectfully submitted,

/s/ Melissa R. Smith

Melissa R. Smith
State Bar No. 24001351
GILLAM & SMITH, LLP
303 South Washington Avenue
Marshall, Texas 75670
Telephone: (903) 934-8450
Facsimile: (903) 934-9257
Email: melissa@gillamsmithlaw.com

***Attorney for Defendants
Samsung Electronics Company, Ltd., and
Samsung Electronics America, Inc.***

/s/ Daniel P. Hipskind

Dorian S. Berger (CA SB No. 264424)
Daniel P. Hipskind (CA SB No. 266763)
Erin E. McCracken (CA SB No. 244523)
BERGER & HIPSKIND LLP
9538 Brighton Way, Ste. 320
Beverly Hills, CA 90210
Telephone: 323-886-3430
Facsimile: 323-978-5508
E-mail: dsb@bergerhipskind.com
E-mail: dph@bergerhipskind.com
E-mail: eem@bergerhipskind.com

Elizabeth L. DeRieux
State Bar No. 05770585
CAPSHAW DERIEUX, LLP
114 E. Commerce Ave.
Gladewater, TX 75647
Telephone: 903-845-5770
E-mail: ederieux@capshawlaw.com

Attorneys for MIMO Research, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(b)(1) on this the 20th day of December, 2022.

/s/ Melissa R. Smith

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Plaintiff and counsel for Defendants have complied with the meet and confer requirement regarding this Motion on December 20, 2022. The Parties are in agreement and are seeking joint relief.

/s/ Melissa R. Smith